



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

REPORT OF INVESTIGATION ALLEGED WILLFUL VIOLATION OF REGULATIONS BY BLM OFFICIAL



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

REPORT OF INVESTIGATION

Case Title Alleged Willful Violation of Regulations by BLM Official	Case Number OI-OG-18-0347-I
Reporting Office Energy Investigations Unit	Report Date August 28, 2018
Report Subject Report of Investigation	

SYNOPSIS

We opened this investigation in February 2018 after receiving allegations that (b) (7)(C) (b) (7)(C) Bureau of Land Management (BLM), encouraged natural resource specialists to overlook regulations so they could process Applications for Permit to Drill more quickly, and that they should protect any staff members who choose to overlook regulations. The comments were alleged to have occurred during an (b) (7)(C) visit by (b) (7)(C) to the BLM (b) (7)(C) Office.

We did not substantiate the allegations and found no evidence to indicate (b) (7)(C) made the statements as alleged.

DETAILS OF INVESTIGATION

We opened this investigation in February 2018, after receiving an anonymous complaint alleging that during an (b) (7)(C) visit to the (b) (7)(C) Office (b) (7)(C) (b) (7)(C) Bureau of Land Management (BLM), stated that natural resource specialists (NRSs) should overlook regulations in order to process Applications for Permit to Drill (APDs) more quickly. (b) (7)(C) also allegedly stated "NRS staff should protect any staff that chooses to overlook regulations."

No Evidence (b) (7)(C) Made Statements as Alleged

(b) (7)(C) confirmed he did address BLM employees at the (b) (7)(C) in (b) (7)(C) and characterized his comments as an (b) (7)(C) overview about goals related to the timely processing of APDs. He denied

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telling employees to overlook regulations and stated that he wants employees to know the regulations rather than “making up stuff.” He did not advise employees to give priority to one company over another regarding APDs; instead, he maintained that companies could request a particular APD be processed over another APD that was in process with BLM. He also affirmed his position that APDs must adequately conform to the National Environmental Policy Act. When asked about the comment that employees would be protected, (b) (7)(C) denied making such a statement. Instead, he said he encouraged employees to streamline processes and work “smarter not harder” (**Attachments 1 and 2**).

(b) (7)(C) was present at the meeting and recalled (b) (7)(C) advising employees to “work around the regulations,” followed by a clarification to stay within the parameters of the law and do nothing illegal (**Attachment 3**).

BLM (b) (7)(C) was present at the meeting and said employees were told they were going to be given whatever resources and technology they needed to get the job done. She said her impression was that they were being encouraged to find shortcuts. She did not recall the exact wording, or if it was (b) (7)(C) or (b) (7)(C) BLM, who said it, but she recalled employees being told they would be “protected” as they went about their duties. (b) (7)(C) recalled a question being asked openly, “protect us from what?” She said it was then further clarified that employees should work within the regulations (**Attachment 4**).

SUBJECT

(b) (7)(C), Bureau of Land Management

DISPOSITION

We are providing this report to the BLM Deputy Director for any action deemed appropriate.

ATTACHMENTS

1. IAR – Interview of (b) (7)(C) dated February 21, 2018.
2. (b) (7)(C) interview transcript, dated February 21, 2018.
3. IAR – Interview of (b) (7)(C), dated February 6, 2018.
4. IAR – Interview of (b) (7)(C), dated May 9, 2018.



ATTACHMENT 1



OFFICE OF
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U.S. DEPARTMENT OF THE INTERIOR

INVESTIGATIVE ACTIVITY REPORT

Case Number OI-OG-18-0347-I	
Reporting Office Energy Investigations Unit	Report Date February 21, 2018
Report Subject Interview of (b) (7)(C), Bureau of Land Management	

On February 21, 2018, Special Agents (SA) (b) (7)(C) and (b) (7)(C), Office of Inspector General (OIG), U.S. Department of the Interior (DOI), interviewed (b) (7)(C), Bureau of Land Management (BLM), at the (b) (7)(C). The purpose of the interview was to ask (b) (7)(C) about certain allegations made against him and other BLM (b) (7)(C) located in the BLM (b) (7)(C) Office. (b) (7)(C) was provided and signed a Garrity form. With the consent of (b) (7)(C) the interview was captured with a digital recorder, and a transcript of the interview was created and is maintained with the investigative file and available for review. The following narrative report is not a verbatim account of the interview, but rather a substantive summary of information provided during the interview.

(b) (7)(C) is currently the (b) (7)(C) BLM and has been in that position since (b) (7)(C). Prior to his current assignment, (b) (7)(C) was the (b) (7)(C) BLM from (b) (7)(C). (b) (7)(C) current duties include providing direction to (b) (7)(C) employees in furtherance of the full “gamut” of agency responsibilities, including (b) (7)(C) and other day-to-day operations of the agency. (b) (7)(C) has worked for DOI since (b) (7)(C).

(b) (7)(C) was asked if he was aware of any complaints coming from (b) (7)(C) field staff about (b) (7)(C) management allowing oil and gas companies to proceed with proposed projects without first complying with environmental laws and regulations. (b) (7)(C) acknowledged that the (b) (7)(C) is a very busy office, but he stated that he was not aware of any such complaints or issues at (b) (7)(C).

According to (b) (7)(C) he is not aware of any complaints from field staff at the (b) (7)(C) about oil and gas companies destroying archaeological sites; however, he has been told “generally” about such companies possibly trespassing on BLM land. He said that he was not provided any specific details of the potential trespasses, and understood that (b) (7)(C) was dealing with the matter.

(b) (7)(C) stated that he has not been informed by field staff that (b) (7)(C) management is acquiescent to these trespasses and destruction of archaeological sites, and therefore is not taking any action to hold the oil

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and gas companies accountable under the law and regulations. He explained that he is regularly pulled aside by field staff and told of their concerns and issues, but this concern has never been raised to him.

When asked, (b) (7)(C) said the he was not aware of any complaints from (b) (7)(C) field staff that management is restricting their internal discussions (with other (b) (7)(C) field staff) concerning the destruction of archeological sites or oil spills.

(b) (7)(C) also stated that he is not aware of any complaints from (b) (7)(C) field staff that they are being prohibited by (b) (7)(C) management to formally document the destruction of archeological sites and oil spills. According to (b) (7)(C) he would consider the failure to document such actions as very serious and therefore he would strive to “get to the bottom” of such failures “ASAP.”

(b) (7)(C) said that he is not aware of complaints that (b) (7)(C) management is showing preference to some oil companies over other companies. He noted that he talked to the (b) (7)(C) staff about handling priorities of the companies. He explained how BLM typically processes applications for permits to drill (APDs) in a First In, First Out method, yet some companies may have higher priorities on APDs that were submitted after previously submitted APDs, and the (b) (7)(C) staff should be cognizant of those priorities, if possible.

When asked, (b) (7)(C) said that he was not aware of any complaints from (b) (7)(C) field staff that categorical exclusions are being inappropriately completed for all temporary surface pipelines, notwithstanding Section 106 of the National Historical Preservation Act.

According to (b) (7)(C) he is not aware of complaints that (b) (7)(C) qualified compliance personnel are significantly understaffed. He explained that he regularly hears that the staff at (b) (7)(C) are overworked and he and others in upper management are working on remedying that situation.

During a (b) (7)(C) Natural Resource Specialist (NRS) Staff meeting at the (b) (7)(C) in (b) (7)(C) (b) (7)(C) said that he talked to the NRS staff about “being smart” when analyzing the National Environmental Policy Act (NEPA) requirements when processing APDs. When asked if he told the NRS staff to overlook regulations when processing APDs in order to expedite their approval, (b) (7)(C) said that such an allegation was “grossly inaccurate.” He explained that he discussed with the NRS staff that BLM needs to determine the NEPA standards adequately, yet once that determination is made, “we need to move on.” If the standards are not determined to adequately meet NEPA requirements, then BLM needs to move toward the next levels of NEPA analysis.

(b) (7)(C) further explained that he had this discussion with NRS staff because certain NEPA documents in the past would exceed 3,000 pages, yet the standards to meet NEPA could have been completed in a far shorter document. He said that when the NEPA documents are so voluminous, the public cannot digest the materials. According to (b) (7)(C) he believes that BLM staff sometimes create very large NEPA analysis documents in an attempt to make the analysis “litigation-proof.” He does not believe there is such a thing as a litigation-proof document because those who are interested in suing the agency will always do so, regardless of how voluminous the document. Accordingly, (b) (7)(C) believes it is more important to have “good science” in the NEPA analysis rather than voluminous, unnecessary documentation.

(b) (7)(C) stated that he (b) (7)(C) to go back to the NEPA law and actually read its contents in order to ensure they are “getting back to the basics” in following the law, and not just producing large

documents because that is the way they have done it in the past. He said he believes in “working smarter, not harder.”

When asked if he has received influence from managers above him inside DOI to direct staff to streamline and expedite the processing of APDs, (b) (7)(C) said that he has been in BLM’s (b) (7)(C) management since (b) (7)(C) and he has said openly that his main job as an (b) (7)(C) is to maintain the integrity of the system, regardless of the policies of a new administration. In maintaining this integrity, he always assesses whether certain proposed actions are legal, safe, moral, ethical and “make sense.” He said that he has had open discussions with DOI’s current leadership and “they know where he stands” on these issues.

(b) (7)(C) explained that BLM is a “multiple use” agency that needs to follow regulations, yet if following the regulations does not “make sense,” then he would propose having a discussion about changing the nonsensical regulations. (b) (7)(C) reiterated, however, that he “absolutely” did not direct NRS staff to overlook regulations. Indeed, he said that he regularly instructs staff to ensure they review all the regulations to make sure they are being followed.

According to (b) (7)(C) the (b) (7)(C) is a busy office and has high turnover. He believes the high turnover is a product of lack of amenities in (b) (7)(C), such as hospitals, schools, and more significantly, a lack of affordable, adequate housing.

When asked, (b) (7)(C) said that he does not understand how the complainant interpreted his message so inaccurately, inasmuch as he regularly tries to go the extra mile in ensuring the staff understands what he is saying. He explained that he always tries to be clear when providing direction and always “checks for understanding,” even to the point of oftentimes asking staff to “tell me what I just said.”

(b) (7)(C) also explained that if staff were experiencing issues such as being told to not discuss violations of environmental laws by their local managers, the staff would have higher levels of managers between them and himself that they could contact to voice their concerns. Therefore, it would not be typical for such concerns to reach his level. He identified the management levels between him and field staff as the (b) (7)(C). Notwithstanding these levels of management between himself and staff, (b) (7)(C) stated that if the staff did possess such concerns, (b) (7)(C) believes that BLM would “need to get on top of” the concerns. He believes it to be very important for staff to be able to work in an environment where they can do their jobs and not be suppressed by management.

(b) (7)(C) said that he never imposes “quotas” on field staff because he is very “cognizant” of how quotas can lead to staff cutting corners to meet such quotas. He did acknowledge that BLM does need to set targets that they are required to relay to Congress, yet BLM will ensure that their offices, including the (b) (7)(C) will have the staff necessary to meet those targets. (b) (7)(C) then explained that he does not set these targets, but rather they are created by subject matter experts within BLM.



ATTACHMENT 2



ATTACHMENT 3



OFFICE OF
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INVESTIGATIVE ACTIVITY REPORT

Case Number 18-0347	
Reporting Office Intake Management Unit	Report Date February 6, 2018
Report Subject Coordination with (b) (7)(C)	

On February 1, 2018, Special Agent (b) (7)(C), Intake Management Unit, Office of Inspector General, U.S. Department of the Interior, conducted a preliminary intake phone call with (b) (7)(b) (7)(C) (b) (7)(C) to determine his recollection of comments made by (b) (7)(C) at the (b) (7)(C) (b) (7)(C) NRS meeting.

(b) (7)(C) stated he recalled (b) (7)(C) telling them to "work around the regulations." (b) (7)(C) said that (b) (7)(C) then "back peddled" and stated "within the law-- we don't want to do anything illegal." (b) (7)(C) added that (b) (7)(C) "brags" that they are the busiest office in the country. (b) (7)(C) believed (b) (7)(C) had a reputation for doing things differently (and not right) from other offices, due to their operational tempo. (b) (7)(C) thought that sometimes they were expected to "cut too many corners." (b) (7)(C) gave an example that he did not believe he had ever completed an environmental assessment, and instead, they had various templates from which they cut and paste.

(b) (7)(C) agreed to be contacted again should more information be required of him.

CONTACT INFORMATION:

(b) (7)(C)
[Redacted contact information]

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ATTACHMENT 4



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INVESTIGATIVE ACTIVITY REPORT

Case Number OI-OG-18-0347-I	
Reporting Office Energy Investigations Unit	Report Date May 9, 2018
Report Subject Interview of (b) (7)(C), BLM (b) (7)(C)	

On April 9, 2018, Special Agents (SA) (b) (7)(C) and (b) (7)(C), Energy Investigations Unit (EIU), Office of Inspector General (OIG), U.S. Department of the Interior (DOI), conducted a voluntary and recorded interview of (b) (7)(C). The interview was conducted at a conference room of the (b) (7)(C). (b) (7)(C) acknowledged and signed a *Garrity* Rights Form prior to the interview.

With her consent, the interview was captured with a digital voice recorder, and the recording is maintained with the investigative file and available for review. The following narrative report is not a verbatim account of the interview, but rather a substantive summary of information provided by (b) (7)(C) during the interview. Subsequent to the interview, (b) (7)(C) provided several documents related to her allegations. On May 4, 2018, the reporting agent and (b) (7)(C) had a brief follow-up discussion regarding the additional information and documents. Where information from those documents is relevant to details discussed during the interview, it is incorporated into this report to provide clarity. Those documents will be uploaded into the electronic case management system along with this report.

As background, (b) (7)(C) has been with (b) (7)(C) where she started as an (b) (7)(C) working in the (b) (7)(C). She is a (b) (7)(C) assignments. (b) (7)(C) holds a (b) (7)(C) from the (b) (7)(C) and a (b) (7)(C) from (b) (7)(C). She is currently a (b) (7)(C) at (b) (7)(C) for a (b) (7)(C). (b) (7)(C) previous experience includes serving as a (b) (7)(C), (b) (7)(C).

On February 2, 2018, (b) (7)(C) filed a complaint with the OIG hotline in which she made numerous allegations against BLM management in (b) (7)(C) further detailed during this interview. (b) (7)(C)

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allegations primarily concerned general mismanagement within (b) (7)(C) which resulted in violations of one or more policies, rules, regulations and/or laws deriving from the National Environmental Protection Act (NEPA), the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act of 1979 (ARPA).

(b) (7)(C) also claimed that the actions of (b) (7)(C) management had a chilling effect upon employees in that they were subject to intimidation and feared retaliation for raising legitimate environmental concerns or providing professional opinions about matters involving cultural or archaeological sites. (b) (7)(C) said she was retaliated against for doing her job and for pointing out discrepancies and/or lack of action by management against industry operators as it related to violations of NEPA, NHPA, ARPA, and generally internal controls utilized by BLM to monitor and manage archaeological sites. (b) (7)(C) also raised concerns regarding (b) (7)(C) management's relationship to the oil and gas industry. (b) (7)(C) drew a connection between lack of internal controls, inconsistencies with policies and procedures, and a general apathy toward regulations, as well as (b) (7)(C) management's relationship to companies such as Chevron.

Specifically, (b) (7)(C) alleged that:

- Chevron has destroyed several archaeological sites since September of 2017;
- Environmental accidents, such as oil and salt water disposal spills, are not documented or subject to proper environmental analysis/compliance;
- (b) (7)(C) is understaffed and positions are purposely filled at lower paygrades to facilitate project approval by unqualified employees;
- Preference is given to some companies over others; and
- Management seems more concerned about facilitating the approval and movement of industry projects than protecting cultural and/or archaeological sites. (b) (7)(C) held several managers responsible, including her direct supervisor, (b) (7)(C), (b) (7)(C), and (b) (7)(C).
- (b) (7)(C) also noted a change in the (b) (7)(C) working atmosphere since the change in the presidential/executive administration.
- Lastly, (b) (7)(C) questioned the integrity of (b) (7)(C), who left (b) (7)(C) in early (b) (7)(C) (b) (7)(C) —where she provides (b) (7)(C) on contract for companies such as Chevron.

(b) (7)(C) provided details relating to each complaint to investigators, some of which are interrelated and/or overlap as part of a general theme of mismanagement and questionable management actions. All documents provided by (b) (7)(C) in support of her complaint and details of her interview, will be topically labeled and uploaded to CMS along with this report.

According to (b) (7)(C) the following archaeological sites have either been impacted, destroyed or are in jeopardy of being destroyed due to ongoing Chevron projects and (b) (7)(C) management's lack of oversight:

1. (b) (4) Entirely destroyed due to an approximately 100 square foot area (sometimes described as a "pad" by industry) that was bulldozed and topped with what appeared to be caliche, or possibly dug down to caliche bedrock to create a staging area for future work at the location. The archaeological feature that was destroyed was an identified "thermal feature" of an ancient fire pit. Chevron accepted responsibility for the site destruction; however, certain issues arose from this incident that demonstrate, among other things, (b) (7)(C)

lack of diligence according to (b) (7)(C) allegations. These deficiencies are highlighted specifically within this report.

2. (b) (4) Chevron (b) (4)
(b) (4) A right of way, normally granted by permit, allows up to 30 feet of public land to be cleared, with an additional 15 feet on either side, for temporary work space. The space may be then used for construction of a road, pipeline or transmission line, for example. To (b) (7)(C) knowledge, construction is currently in progress, and the ground disturbance is currently only about five feet from a specific archaeological (thermal) feature.
3. (b) (4): A reroute to the south of the site was established to avoid an archaeological feature ("resource"). According to (b) (7)(C) when she visited the site, the road had been cleared through the area originally identified to be avoided and very close to the feature.
4. (b) (4): Chevron submitted a (b) (4)
(b) (4) wells located on a BLM lease (lease number unknown). A sundry notice is a written request to perform work not covered by another type of permit, or to change operations relating to a previously approved permit. During the construction of the CTB, this cultural resource was destroyed. The location for this CTB was never entered into the Master Development Plan (MDP), application for permit to drill (APD) in the BLM (b) (7)(C) database, IT4RM.

Agent's note: The issues surrounding the (b) (4) provided investigators with detailed information relating to (b) (7)(C) complaints of mismanagement and subsequent archaeological damage. A more technical explanation of each destroyed site has been documented in a separate report, authored by SA (b) (7)(C) and located at Tab 13 of the electronic case file.

According to (b) (7)(C) an archaeological site, such as the one in (b) (4) has the potential to yield valuable scientific data which is encapsulated in thermal features (such as a fire pit) utilized by Native Americans for activities such as cooking or ceremonies. It may also include, as (b) (4) does, the presence of diagnostic ceramics at the site that can be culturally affiliated with a people who lived throughout the southwest after the Archaic period, sometime between 600 to 2,000 years ago. Such sites are typically protected from destruction or, with approval, subject to scientific and technical testing and cataloging. This process is known as data recovery, where scientific information about a site is archived in federal and state repositories for later reference and understanding of the site that once existed at a particular location. (b) (7)(C) advised that "data recovery" as a concept refers to any activities designed to recover the information within a site that makes it eligible for recognition under the NHPA. These are sites that either yield or are likely to yield important information relating to "prehistory" or history in a particular area. BLM must work with the New Mexico State Historic Preservation Office (SHPO) and affected tribes in accordance with NHPA (and 36 CFR part 800), and any agreements with the SHPO.

(b) (7)(C) said there are approximately 13,000 identified cultural and/or archaeological sites in the (b) (7)(C) area, and many are protected from development on public lands. The site destroyed at (b) (4) (b) (4) is one such site identified for preservation, as it was recommended as eligible for protection NHPA by BLM archaeologists and the SHPO in 2013. As a result, all oil and gas projects proposed in the vicinity of this archaeological site can only be authorized by the BLM if the site is avoided by at

least 100 feet of physical (buffer) space between the protected archaeological site and the oil and gas infrastructure. The only other way for an oil and gas project to be approved by BLM when there is a protected archaeological site in the vicinity is to utilize the data recovery process.

The (b) (4) archaeological site was entirely destroyed sometime between June 2016 and September 2017 by placing a pad for construction/staging area where the site was once located. The site had been the location of a thermal archeological feature that had already been recommended for preservation. No data recovery was conducted on this site prior to the destruction.

(b) (7)(C) learned about the destruction of the site (b) (4) in September 2017, when (b) (7)(C) (b) (7)(C) and working (b) (7)(C) for Chevron, came to (b) (7)(C) and informed (b) (7)(C) and (b) (7)(C) that it was destroyed. (b) (7)(C) claimed she discovered the site was destroyed when she went to the area to address a frac pond spill. (b) (7)(C) advised (b) (7)(C) and (b) (7)(C) that both Chevron and another involved company, Mesquite, were sharing responsibility for the site being destroyed. As far as (b) (7)(C) believed, this was simply (b) (7)(C) opinion, but not an official conclusion of BLM. Furthermore, to (b) (7)(C) knowledge, Mesquite has never officially accepted responsibility. This is one reason (b) (7)(C) believed BLM should be the investigating the matter and making a final determination as to the responsible companies. (b) (7)(C) instructed (b) (7)(C) to do a damage assessment of the site (b) (4), which she would be doing as a (b) (7)(C) for Chevron. According to (b) (7)(C) this was not the proper way to further investigate the matter. Additionally, (b) (7)(C) was upset that Chevron was communicating such information to their (b) (7)(C) (b) (7)(C) (b) (7)(C) and not directly to (b) (7)(C) as a representative of BLM.

(b) (7)(C) was concerned about the unauthorized construction at the (b) (4) and decided to discuss the incident with (b) (7)(C) a BLM (b) (7)(C). (b) (7)(C) is the responsible BLM official that deals with (b) (7)(C) accidents—like spills. (b) (7)(C) believed (b) (7)(C) could also possibly investigate site destruction further in her role as part of the environmental division of (b) (7)(C) regardless of whatever assessment (b) (7)(C) was doing on contract for Chevron. However, during her discussion with (b) (7)(C) about the site destruction, it appeared (b) (7)(C) was already aware of the concerns about the site and had been in contact with a representative of Chevron (possibly (b) (7)(C)) about it. From (b) (7)(C) understanding of the events, she had been kept out of the loop completely. She now understood what had happened. (b) (7)(C) had already been in contact with Chevron, who then contacted (b) (7)(C), who then came to the (b) (7)(C) office to talk to (b) (7)(C) and (b) (7)(C). (b) (7)(C) essentially learned of the site destruction in reverse order, and only because (b) (7)(C) came to the office to give her opinion.

Agent's note: (b) (7)(C) expressed to agents that she felt like since (b) (7)(C) BLM she has taken liberties due to her prior BLM position and relationship with (b) (7)(C) management. (b) (7)(C) said that when (b) (7)(C) comes into the (b) (7)(C) office now, she basically tells (b) (7)(C) what to do and has the ear of management. (b) (7)(C) is also alleged to be in an ongoing (b) (7)(C) with BLM employee (b) (7)(C) who works at the BLM (b) (7)(C). (b) (7)(C) implied (b) (7)(C) was close to management and may be sharing some type of information, unknown at this time, with (b) (7)(C).

Now aware of the site (b) (4) destruction, (b) (7)(C) said that on (b) (7)(C), she went in the field to investigate the matter, with (b) (7)(C) and (b) (7)(C) another (b) (7)(C). (b) (7)(C) BLM (b) (7)(C). During the site visit, (b) (7)(C) took GPS points and photographs, which are still maintained in the (b) (7)(C) GIS database. She provided investigators with further information to locate if

necessary. She noted the data should also be available on the BLM's (b) (7)(C) Office server. While on site, (b) (7)(C) said she, (b) (7)(C) and (b) (7)(C) observed that a staging/construction pad was constructed on top of what was site (b) (4), and vehicles were parked there. The area in which the archaeological site had been, was completely cleared and leveled.

(b) (7)(C) subsequent review of information collected on site noted that Mesquite's surface pipeline intersected what had been the northern portion of the established archaeological site, but she could not find a plat of the supposed reroute the BLM provided anywhere in the (b) (7)(C) database (including a review of NEPA documents). She concluded there was never a cultural survey completed for the area and therefore she notified her supervisor (b) (7)(C) the (b) (7)(C), of the issues she found. (b) (7)(C) also told (b) (7)(C) that she was not in agreement with (b) (7)(C), being the only one in contact with Chevron about the matter. (b) (7)(C) let (b) (7)(C) know she already had collected GPS points and photos of the staging pad and that there was nothing left of the archaeology site. (b) (7)(C) also advised (b) (7)(C) a (b) (7)(C) that Chevron constructed (b) (4), (b) (4), as approved. (b) (7)(C) said he would investigate further.

According to (b) (7)(C) she also informed (b) (7)(C) of the site destruction (b) (4) and the (b) (4) pipeline route. She expected him to do something about the pipeline being constructed at the site, despite (b) (4) in the (b) (7)(C) system. She recalled either (b) (7)(C) or (b) (7)(C) insisting on a meeting to discuss the matter. (b) (7)(C), (b) (7)(C) and (b) (7)(C) attended, along with NEPA (b) (7)(C), (b) (7)(C) and (then) (b) (7)(C). (b) (7)(C) contacted a representative of Chevron (b) (7)(C) who apologized and admitted Chevron destroyed the site. (b) (7)(C) indicated Chevron would remedy the situation as instructed by BLM. (b) (7)(C) noted that after the call, (b) (7)(C) slammed the table, acknowledged Chevron was the responsible party and walked out of the meeting.

(Agent's note: As one of the intertwining and/or personal relationships that (b) (7)(C) noted within BLM, she believes (b) (7)(C) and (b) (7)(C) share a (b) (7)(C) -in-common, due to the (b) (7)(C) (b) (7)(C)).

(b) (7)(C) recalled (b) (7)(C) said (b) (7)(C) needed to do a NEPA assessment due to the situation, because BLM is required to analyze the impacts to the environment due to trespasses and spills. However, (b) (7)(C) recalled (b) (7)(C) advised it was "illegal" to discuss the destroyed site until the investigation was complete. This perplexed (b) (7)(C). (b) (7)(C) argued this with (b) (7)(C) but it was eventually agreed the matter would not be discussed internally. (b) (7)(C) told (b) (7)(C) she could do the damage assessment as Chevron already admitted fault and she already documented the destruction while out in the field. However, (b) (7)(C) told her that this was a service Chevron should pay for. (b) (7)(C) said she explained to him that she wanted the experience and thought it was a conflict of interest for (b) (7)(C) to do the damage assessment and investigate the matter further.

Soon after that meeting and her discussion with (b) (7)(C), (b) (7)(C) asked (b) (7)(C) during a phone conversation where she found a reroute for the Mesquite pipeline that intersected (b) (4). (b) (7)(C) said it was in the Environmental Assessment (EA). (b) (7)(C) advised her she was not able to determine this by the plats in the EA, which is one of many NEPA documents are in an archive folder on the IT4RM online database. (b) (7)(C) then told (b) (7)(C) that Chevron was (b) (4) and that she could not do the damage assessment as a result. (b) (7)(C) was not clear what exactly this meant but it appeared to possibly be some business dispute between the parties—although (b) (7)(C) would later go on to do work for Chevron, after this conversation took place.

(b) (7)(C) advised (b) (7)(C) that she did not understand why (b) (7)(C) was having her do the assessment and that (b) (7)(C) would be happy to do it herself, as a (b) (7)(C) said that she found it more prudent to make Chevron and Mesquite have an (b) (4) every construction project rather than pursue a monetary penalty, because both operators are always submitting proposed projects to the BLM that could affect archaeology. (b) (7)(C) further advised (b) (7)(C) that both companies participate in the (b) (7)(C) Programmatic Agreement (PA) and thus are supposed to use the provided archaeology site location data to avoid all known archaeology sites. However, (b) (7)(C) noted to (b) (7)(C) that she had to create “re-routes” for both operators on several, if not most projects. She was now concerned those re-routes were not being followed. (b) (7)(C) explained to (b) (7)(C) how she was not comfortable with re-routes as they were known to not be an effective mitigation measure in oil fields related to this part of (b) (7)(C). (b) (7)(C) noted this was a primary argument utilized to establish the (b) (7)(C) PA in 2008.

According to (b) (7)(C) about a week after this phone contact with (b) (7)(C), (b) (7)(C) showed her a letter that (b) (7)(C) (representing Chevron) forwarded him from (b) (7)(C) saying she does not need to do a damage assessment, claiming (b) (7)(C) only required the site to be documented as “destroyed”. In this (b) (7)(C) email, (b) (7)(C) also implied BLM was responsible for the site being destroyed. The email text from (b) (7)(C) writing to Chevron representatives, states the following:

“I talked to (b) (7)(C) and she only recommends us updating/documenting the condition of the site so it can officially be listed as destroyed. She seemed to acknowledge that the site was left vulnerable due to BLM approving so many projects so close to it. So, a good outcome for Chevron and Mesquite. I just need you to authorize me to do this work for you before we proceed.”

Chevron responded via email, authorizing (b) (7)(C) to proceed. Eventually the email chain made it to (b) (7)(C) who then shared it with (b) (7)(C). Alarmed by (b) (7)(C) assertions, (b) (7)(C) then forwarded the correspondence to her management. (b) (7)(C) said she did not receive any response or feedback from (b) (7)(C) management. Because of this, (b) (7)(C) said she addressed the matter with senior colleagues in the (b) (7)(C) Department of BLM, (b) (7)(C) and (b) (7)(C), seeking their advice. (b) (7)(C) said she wondered if her conversation with (b) (7)(C) could have been misinterpreted by (b) (7)(C). According to (b) (7)(C), (b) (7)(C) and (b) (7)(C) recommended she email Chevron, copying her supervisors to inform them the matter was still under review, and BLM management would be making decisions about any actions to take, thus correcting and clarifying any possible “miscommunication” that may have been relayed by anyone else (i.e. (b) (7)(C)). (b) (7)(C) sent this email on (b) (7)(C) and provided these emails to investigators for the electronic case file.

(b) (7)(C) recalled that soon after this incident she began having problems with (b) (7)(C) (Chevron), who had assumed projects at (b) (7)(C). He insisted on expanding construction near another site (b) (4) although (b) (7)(C) disagreed. She explained that they agreed to meet at the site, but she said no one was there upon her arrival. She then called (b) (7)(C) and he sent her to another site. After she contacted him from that site, he advised her he could not make it to the site after all, but that surveyors would be there. (b) (7)(C) said no surveyors arrived. She did, however, meet a pipeline operator who advised he did not work for Chevron (exact identity unknown). The pipeline operator called (b) (7)(C) by cell and (b) (7)(C) said (b) (7)(C) disagreed about the site location and “demanded” she make the BLM site location data available to land

surveyors so they could avoid the archaeological site (b) (4). (b) (7)(C) said these (third party) surveyors did not have authorization to the archaeological sites locations, as they had not completed data use agreements which are required by BLM.

According to (b) (7)(C) each year, companies such as Chevron, pay into an archaeological research fund. The fund is known as a Programmatic Agreement (PA) between local and federal government agencies, private industry, and Native American Tribes. It is an alternative compensatory mitigation agreement that allows industry to pay into a research fund in lieu of doing typical survey work to identify and avoid archaeological sites. The contribution permits the project planners for each company (such as Chevron) to have access to relevant archaeological site location data for project planning purposes. The planners must sign data use agreements and it is not "transferable" to, for example, third-party surveyors. It is understood that the BLM site information will assist companies in the avoidance of known archaeological sites. This does not always happen, as was demonstrated with the destruction of the (b) (4).

The PA fund is managed by a work group which is composed of representatives from the archaeological research community, the SHPO, the BLM, the Advisory Council of Historic Preservation (ACHP), and industry, and a representative from each of the seven Indian Tribes and Pueblos. Industry can use the fund voluntarily to pay a comparable amount as a traditional archaeology survey would cost for each proposed project. For example, industry may elect to pay \$1550 to the archaeological research fund with their permit for an Application to Drill. This would provide archaeological clearance for the proposed project. The BLM keeps accurate records of funds contributed by industry and shares those records with the public.

The funds are then used on projects decided on by the PA work group and awarded through a strict, competitive contracting process. This process allows for only four contractors to bid on specific task orders and is based upon the strict qualifications that contractors must possess to perform services ranging from Class III inventories, to data recovery, to the preparation of NRHP nominations and ethnographic studies. Signing up for the PA is voluntary and does not cost anything. (b) (7)(C) does not know all the accounting procedures involved with a PA, but believes BLM administration staff, possibly in (b) (7)(C) handle the details. The (b) (7)(C) PA fact sheet will be uploaded along with this report.

(Agent's note: (b) (7)(C) told investigators that while (b) (7)(C) was her supervisor at BLM, she encouraged (b) (7)(C) to use PA's, but later, as a (b) (7)(C), complained to (b) (7)(C) management about (b) (7)(C) using PA's with industry because it interfered with (b) (7)(C) business model, which is to provide specific archaeological work on contract to companies like Chevron).

(b) (7)(C) immediately let management know of the situation involving (b) (7)(C) and site (b) (4) when she returned from the field, and continued informing them of her concerns about Chevron (b) (4). (b) (7)(C) said she also noted to management that (b) (7)(C) was still awaiting the damage assessment on this site, from (b) (7)(C). Around this time, (b) (7)(C) recalled her immediate supervisor (b) (7)(C) was becoming hostile toward her, in what she described as a "backhanded" and "passive aggressive" manner. As an example, (b) (7)(C) recalled a sensitive matter involving the (b) (7)(C). She originally took "sick" leave (in lieu of annual), but (b) (7)(C) was advised in an email by (b) (7)(C) to code this leave as what (b) (7)(C) characterized as "vacation time". (b) (7)(C) does not have a copy of this email but learned this from (b) (7)(C) who showed her what (b) (7)(C) wrote, somewhat apologetically. (b) (7)(C) works

directly under (b) (7)(C). (b) (7)(C) complained to (b) (7)(C), about what she perceived as (b) (7)(C) insensitivity to her situation but received no response. She also emailed (b) (7)(C) directly, suggesting that he speak to her directly about any questions involving her Quicktime, instead of emailing (b) (7)(C) and (b) (7)(C).

By late (b) (7)(C) called for a meeting to resolve the issues (b) (7)(C) was experiencing with Chevron. (b) (7)(C) recalled that on (b) (7)(C), (b) (7)(C) asked (b) (7)(C) and (b) (7)(C) to attend this meeting in the (b) (7)(C) conference room at (b) (7)(C). (b) (7)(C) told agents there is a log sheet related to signing up for the room by date/time and that it would be typical of (b) (7)(C) to use this, and it is possibly available for review should it be needed. (b) (7)(C) said that at this meeting, (b) (7)(C) told her (b) (7)(C) was now claiming Chevron was not allowing her to proceed with documenting the site damage. (b) (7)(C) questioned why (b) (7)(C) would need "permission" given that the site was on public land and BLM was requesting the work. (b) (7)(C) instructed (b) (7)(C) to contact whomever she normally worked with at Chevron, noting that they needed someone "higher-up" to answer BLM questions.

As (b) (7)(C) recalls, the Chevron representative ended up being an engineer or someone who is a coordinator for spills, someone who had no knowledge of the incident and repeatedly stressed this to (b) (7)(C). She said the engineer was able to locate some emails indicating (b) (7)(C) was given permission by Chevron to proceed with the damage assessment of the site. Completely frustrated at this point, (b) (7)(C) recalled saying she was "pissed off" at the meeting—sensing that Chevron and (b) (7)(C) were giving BLM the runaround. She also expressed concern at the meeting that if nothing was done about this particular site, they would simply continue destroying other sites. She said (b) (7)(C) admonished her for being too "emotional" about the situation, which is why she could not do the damage assessment (although this had not been raised before). (b) (7)(C) said she stood up, told (b) (7)(C) to "Do what you will" and walked out of the meeting. She advised agents that it was her job to point out such violations. She viewed his comments during the meeting and response to her via email, as evidence of retaliation.

On (b) (7)(C), two days after the meeting, (b) (7)(C) sent the following via email:

In regards to our Chevron meeting on (b) (7)(C) approximately 9:30 a.m. attended by (b) (7)(C), your behavior was unprofessional and unacceptable. Although, you are entitled to your professional opinion, raising your voice and (b) (7)(C) is not acceptable. Your behavior is considered rude.

(b) (7)(C) responded shortly after, stating:

I apologize if my behavior was perceived as being rude. I am frustrated that time and again you have sided with contractors over my professional recommendations to resolve complex issues. In the case of site (b) (4) being entirely destroyed by Chevron, and possibly Mesquite as well, (b) (7)(C) refusal to do a damage assessment and to provide misleading information to both Chevron and the BLM is upsetting. The fact that the BLM was made aware of the situation almost two months ago and nothing has been done since is also unfortunate. During the meeting you accused me of being unable to pursue the ARPA action for the site destruction because I am "too emotional" over it, and you think that the same contractor that is dragging their heels on this should do it instead. It is my job first and foremost to protect cultural

resources in the (b) (7)(C) and I don't think I'm able to do my job here. If you would like to discuss this more please let me know.

(b) (7)(C) copied (b) (7)(C), who never responded or addressed the issue with her directly. (b) (7)(C) advised investigators that the situation escalated shortly after this incident. She said on this same date, she was chatting with BLM (b) (7)(C), and told him what happened with (b) (7)(C) and how she believed she was not able to do her job or pursue Chevron for destroying an archaeology site. She said soon after, she was confronted by (b) (7)(C), who came out of his office angry and in her face, yelling at her with his hands made into fists at his side. (b) (7)(C) said she was scared, and while she did not recall exactly what (b) (7)(C) said to her, it generally related to a claim she was being "unprofessional". (b) (7)(C) relayed that she was genuinely surprised that she could have said anything to illicit such an angry response from (b) (7)(C). She said (b) (7)(C) joked that she need to quit caring about her job so much. Later that day, (b) (7)(C) wrote her up, addressing the matter in an email, with an attached document of the same comments, with his signature. According to (b) (7)(C) she feared losing her position at (b) (7)(C). She also advised investigators that over a period of time, her oversight and compliance responsibilities were taken away and given to (b) (7)(C).

On (b) (7)(C), (b) (7)(C) was told by (b) (7)(C) that he was scheduled to attend a meeting with Chevron in the coming days that related to a new MDP. (b) (7)(C) usually attended Chevron meetings that related to project planning. She confided to (b) (7)(C) that she suspected management was covering up the (b) (4) site destruction and were thus intentionally keeping her out of the meeting. She said (b) (7)(C) assured her no (b) (7)(C) were invited, which she said both he and she thought was odd. He also disclosed to her that (b) (7)(C) told him not to do (b) (4) Chevron anymore, although Chevron was submitting one to (b) (7)(C). This made him suspicious, according to her conversation with (b) (7)(C). She said shortly after this, (b) (7)(C) approached (b) (7)(C) and asked him to invite all the (b) (7)(C) to the meeting.

After she was invited to the meeting, (b) (7)(C) emailed (b) (7)(C) to, once again, inquire as to the status of the damage assessment report that BLM was to receive from (b) (7)(C). (b) (7)(C) responded, "I had a discussion with (b) (7)(C) recently and she in progress of getting this report to us this month". According to (b) (7)(C) prior to the meeting (held (b) (7)(C)), (b) (7)(C) approached her to ask about the site, and assured her he would do whatever (b) (7)(C) needed to resolve the matter. (b) (7)(C) advised (b) (7)(C) she was not certain what the status was but would advise him once she knew. (b) (7)(C) said that during the meeting, (b) (7)(C) then instructed (b) (7)(C) not to refer to the subject of the meeting, (b) (7)(C) project, as a "(b) (7)(C)" because MDPs attract too much attention from the public. (b) (7)(C) told investigators that she believed it was BLM's duty to be transparent and accountable.

(b) (7)(C) said that around the same time, she was in contact with (b) (7)(C) and (b) (7)(C) for the BLM regions of (b) (7)(C). She said they spoke by phone and (b) (7)(C) made (b) (7)(C) aware of issues she was having in the office, including that she was being retaliated against and being told she was not allowed to do her job. While she did not discuss specifics of the Chevron situation, she advised she was not able to work for (b) (7)(C) as her supervisor. She advised (b) (7)(C) that (b) (7)(C) took away nearly all of her compliance work and other work such as research projects.

(b) (7)(C) said they discussed (b) (7)(C) attitude toward women, and (b) (7)(C) recommended she file an EEO complaint. However, (b) (7)(C) did not think that was the issue, but instead that he did not like her

due to her competence on the job. (b) (7)(C) said that (b) (7)(C) management seemed to prefer hiring (b) (7)(C) to do work, such as compliance activities, more suited for more experienced employees. One of these trainees was (b) (7)(C) a new (b) (7)(C) that only worked at (b) (7)(C). (b) (7)(C) said that she felt like these trainees were simply hired to sign off on things, sometimes million-dollar oil and gas projects. She said (b) (7)(C) told her she was not comfortable doing some of the work (b) (7)(C) required of her relating to projects. (b) (7)(C) told (b) (7)(C) that (b) (7)(C) in fact was violating state protocols as outlined by the State Historic Preservation Office (SHPO) of (b) (7)(C), which indicates an (b) (7)(C) has to be a (b) (7)(C) or above to do compliance work. (b) (7)(C) said she could tell this made (b) (7)(C) nervous.

(b) (7)(C) expressed her desire to (b) (7)(C) to the (b) (7)(C) office to get out of what she described as a "hostile work environment" and also because she still wanted to stay in (b) (7)(C). (b) (7)(C) said (b) (7)(C) later told her that (b) (7)(C) had contacted (b) (7)(C) management in (b) (7)(C) to advise them they were required to report and/or take action on issues (b) (7)(C) brought to their attention. She was also requesting (b) (7)(C) transfer to the (b) (7)(C) office due to her complaints. However, (b) (7)(C) said (b) (7)(C) management never discussed the substance of her complaints to (b) (7)(C) (which were relayed to (b) (7)(C)), or the possibility of working in (b) (7)(C). (b) (7)(C) said that is when she realized "all of this went much higher" than (b) (7)(C) and she felt she no options but to find a new job. She also said at this time, she stopped taking her concerns to management, instead keeping all communications with (b) (7)(C) supervisors brief.

Shortly before her (b) (7)(C), she learned that (b) (7)(C) wanted to have a meeting with Chevron and she was invited. She was then invited by (b) (7)(C) to an internal only, pre-meeting prior the scheduled meeting with Chevron. The internal meeting took place on (b) (7)(C), (b) (7)(C) and was attended by (b) (7)(C). They then had a meeting the following day (b) (7)(C) in which Chevron representative were present, to discuss site damage and/or data recovery. (b) (7)(C) recorded those conversations and later provided them to OIG for review and safekeeping. (b) (7)(C) described both meetings as awkward and possibly "just for show," to simply give management the opportunity to give Chevron a pass, not holding them accountable for ARPA violations. (b) (7)(C) provided a general summary of the two conversations, to include the names of those present and the substance of the meetings. That summary will be uploaded along with this report and maintained in OIG's case management system. (b) (7)(C) noted that (b) (7)(C) in (b) (7)(C) on (b) (7)(C), no damage assessment for (b) (4) had been received from (b) (7)(C).

In her contacts with OIG, (b) (7)(C) expressed disappointment and concern with (b) (7)(C) management, advising in essence that they seemed too concerned with working with industry versus serving the public. She recalled on one occasion during an office meeting, (b) (7)(C) made sure to point out to employees that it costs Lucid (a midstream company) about (b) (4) each mile of pipeline laid down. (b) (7)(C) said that for some reason, he felt it was "important" for employees to know that. She did not question why he mentioned it. (b) (7)(C) also said (b) (7)(C) was for example, telling new employees that the regulations were "out of date".

(b) (7)(C) advised that Categorical Exclusions are being completed for all temporary surface pipelines. Previously these were being analyzed under the Council on Environmental Quality (CEQ)/NEPA and were documented and made available to the specialists and the public. The use of categorical exclusions means projects are not routed to specialists for review and compliance with regulations. (b) (7)(C) said she only discovered this through a casual work conversation and was upset because those particular projects are still subject to NHPA section 106 compliance (b) (7)(C).

said she does not trust that compliance is actually being completed for cultural resources or in protection of the environment. She said she is not even convinced these pipelines are necessarily “temporary”. She does not think BLM is documenting spills in these areas either.

(b) (7)(C) said things have changed in the last six months, the timeframe incorporating most of her complaints. As she recalled, things changed for the worse, when the (b) (7)(C) (b) (7)(C) . She noted to investigators that the issues she raised to investigators would not have happened before or gone on long without notice. (b) (7)(C) advised (b) (7)(C) are supposed to turn work in to BLM within 30 days. (b) (7)(C) anticipated report on (b) (4) , is still pending, more than six months after the site destruction.

Noting the general change in atmosphere, (b) (7)(C) recalled an all-hands meeting in the (b) (7)(C) in which (b) (7)(C) , BLM, came to speak to employees. (b) (7)(C) (b) (7)(C) BLM was also there, as were (b) (7)(C) and (b) (7)(C) . (b) (7)(C) said employees were told they were going to be given whatever they needed to get the job done, to include unlimited resources and technology. She said her impression was that they were being encouraged to find shortcuts. She did not recall the exact wording, or if it was (b) (7)(C) or (b) (7)(C) , but employees were told they would be “protected”, to which (b) (7)(C) asked “protect us from what?” She said it was then further clarified by management they did want employees to work within regulations.

(b) (7)(C) told agents that there are several other individuals who work or have worked in (b) (7)(C) that could provide valuable information. That contact information will be uploaded into the electronic case management system along with this report. She included, in addition to those already noted within this report, (b) (7)(C) within the (b) (7)(C) division, as well as (b) (7)(C) advised (b) (7)(C) also served as the (b) (7)(C) (b) (7)(C) , who according to (b) (7)(C) understanding, reported concerns he was having about (b) (7)(C) management to the (b) (7)(C) office (possibly to (b) (7)(C) directly). She said as a result, (b) (7)(C) took his responsibilities away from him, which included writing the (b) (7)(C) , which (b) (7)(C) said had not been updated since the late 1990’s. (b) (7)(C) BLM to work as an (b) (7)(C) . (b) (7)(C) did not know further details about what he might have reported to the state office, but believes (b) (7)(C) will be receptive to meeting with OIG investigators to discuss further. She also provided contact information for (b) (7)(C) , who (b) (7)(C) and (b) (7)(C) .



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

Memorandum

To: Brian Steed, Deputy Director
Bureau of Land Management

From: Mary L. Kendall *Mary L. Kendall*
Deputy Inspector General

Re: Report of Investigation – Alleged Willful Violation of Regulations by BLM
Official
Case File No. OI-OG-18-0347-I

We investigated allegations that (b) (7)(C) (b) (7)(C) Bureau of Land Management (BLM), encouraged natural resource specialists (NRSs) to overlook regulations so they could process Applications for Permit to Drill more quickly, and that NRS staff should protect staff members who choose to overlook regulations. The comments were alleged to have occurred during an (b) (7)(C) visit by (b) (7)(C) to the BLM (b) (7)(C) Office.

We did not substantiate the allegations and found no evidence to indicate (b) (7)(C) made the statements as alleged.

We are providing the attached report of investigation to you for your information. We intend to publish the results of this investigation on our website, in redacted or summary form, within 30 days from the date of this memorandum. If you have any questions, please contact (b) (7)(C) Special Agent in Charge, (b) (7)(C)

Attachment

cc: William Woody, Director
Office of Law Enforcement and Security

(b) (7)(C)
Internal Affairs, Office of Law Enforcement and Security

(b) (7)(C)
Office of Law Enforcement and Security